

MICHELLE D. ALARIE  
Nevada Bar No. 11894  
ARMSTRONG TEASDALE LLP  
3770 Howard Hughes Parkway, Suite 200  
Las Vegas, Nevada 89169  
Telephone: 702.678.5070  
Facsimile: 702.878.9995  
[MAlarie@atllp.com](mailto:MAlarie@atllp.com)

DAVID C. CASTLEBERRY  
Nevada Bar. No. 8981  
MANNING CURTIS BRADSHAW  
& BEDNAR PLLC  
136 East South Temple, Suite 1300  
Salt Lake City, Utah 84111  
Telephone: 801.363.5678  
Facsimile: 801.364.5678  
[dcastleberry@mc2b.com](mailto:dcastleberry@mc2b.com)

*Attorneys for Defendant Barrick Goldstrike Mines, Inc.*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

ELIZABETH SWEENEY, as surviving spouse,  
actual owner of the claims set forth herein, and/or as  
authorized personal representative of the estate of  
MICHAEL CHRISTOPHER SWEENEY, deceased,

Plaintiff,

vs.

BARRICK GOLDSTRIKE MINES INC., a Foreign  
Corporation,

Defendant.

Case No.: 3:20-cv-644

**STIPULATION AND ORDER TO  
EXTEND DEFENDANT BARRICK  
GOLDSTRIKE MINES INC.'S  
DEADLINE TO RESPOND TO  
COMPLAINT**

**[FIRST REQUEST]**

Defendant, BARRICK GOLDSTRIKE MINES, INC. ("Barrick"), by and through its counsel, Manning Curtis Bradshaw and Bednar, PLLC and Armstrong Teasdale LLP, and Plaintiff ELIZABETH SWEENEY, ("Sweeney"), by and through her counsel, Kemp & Kemp, Attorneys at Law, hereby agree and stipulate to extend the deadline for Barrick to answer or otherwise respond to the Complaint from February 5, 2021, 2021, to March 4, 2021. This is the first request to extend this particular deadline.

Sweeney served the Summons and Complaint against Barrick on January 15, 2021, asserting claims for disability discrimination under the ADA and NRS 613.330.

Good cause exists to extend the deadline for Barrick to respond to the Complaint to March 4, 2021. Lead counsel for Barrick was required to quarantine until January 26, 2021, after his family members contracted COVID earlier in the month. As a result, counsel for Barrick needs additional time to gather information to answer or otherwise respond to the Complaint. Sweeney has agreed to this extension of the response deadline. The parties believe the extension will not unduly delay proceedings as this case is still in its infancy and no scheduling order is currently in place. This stipulation is entered into in good faith and is not filed for improper purposes.

Accordingly, the parties request that this Court extend Barrick's deadline to answer or otherwise respond to the Complaint to March 4, 2021.

DATED this 28th day of January, 2021.

DATED this 28th day of January, 2021.

**KEMP & KEMP**

**MANNING CURTIS BRADSHAW &  
BEDNAR PLLC**

By: /s/ James P. Kemp (signed w/ permission)

By: /s/ David C. Castleberry

JAMES P. KEMP, ESQ.  
Nevada Bar No. 006375  
7435 W. Azure Drive, Suite 110  
Las Vegas, Nevada 89130  
Telephone: (702) 258-1183  
Facsimile: (702) 258-6983  
[jp@kemp-attorneys.com](mailto:jp@kemp-attorneys.com)

DAVID C. CASTLEBERRY  
Nevada Bar No. 8981  
MANNING CURTIS BRADSHAW  
& BEDNAR PLLC  
136 East South Temple, Suite 1300  
Salt Lake City, Utah 84111  
Telephone No.: (801) 363-5678  
Facsimile No.: (801) 364-5678  
[dcastleberry@mc2b.com](mailto:dcastleberry@mc2b.com)

*Attorneys for Plaintiff Elizabeth Sweeney*

MICHELLE D. ALARIE  
Nevada Bar No. 11894  
ARMSTRONG TEASDALE LLP  
3770 Howard Hughes Parkway, Suite 200  
Las Vegas, Nevada 89169  
Telephone: 702.678.5070  
Facsimile: 702.878.9995  
[MAlarie@atllp.com](mailto:MAlarie@atllp.com)

*Attorneys for Defendant Barrick Goldstrike  
Mines, Inc.*

**ORDER**

**IT IS SO ORDERED.**

*William G. Cobb*

---

UNITED STATES MAGISTRATE JUDGE

DATED: January 28, 2021

---